

**STATE OF RHODE ISLAND AND PROVIDENCE PLANTATIONS
PUBLIC UTILITIES COMMISSION**

IN RE: PETITION OF
NAUTILUS SOLAR ENERGY, LLC
FOR DECLARATORY JUDGMENT ON
RHODE ISLAND GENERAL LAWS
§ 39-26.4, THE NET METERING ACT

Docket No. 5122

MOTION TO INTERVENE BY
GREEN DEVELOPMENT, LLC WED GW SOLAR, LLC, WED PORTSMOUTH ONE, LLC,
GD HOPKINTON MAIN I, LLC, WED SHUN I, LLC, WED GREEN HILL, LLC

By its attorneys, Green Development, LLC, WED GW SOLAR, LLC, WED PORTSMOUTH ONE, LLC, GD HOPKINTON MAIN I, LLC, WED SHUN I, LLC, WED GREEN HILL, LLC (“Green”) move to intervene in the above-captioned proceeding pursuant to Rule 1.14 of the Rhode Island Public Utilities Commission (“PUC”) Rules of Practice and Procedure (“Rules”), 810-RICR-00-00-1. In support of this motion, Green states:

1. Green is a developer of renewable energy projects across Rhode Island.
2. Rule 1.14(B) states any person claiming an interest of such nature that intervention is necessary or appropriate may intervene in any proceeding before the PUC.
3. It is necessary and appropriate that Green intervene in this proceeding as Green has an interest that will be directly affected, which is not adequately represented by existing parties, and will be bound by the Commission’s action in the proceeding. Rule 1.14(B)(2).
4. Green owns and operates and is planning renewable energy development projects on behalf of Public Entities, Educational Institutions, Hospitals, Nonprofits, and Multi-Municipal Collaboratives through Net Metering Financing Arrangements pursuant to Rhode Island’s Net Metering Act, § 39-26.4, and National Grid’s Net Metering Tariff, R.I.P.U.C. No. 2241.

5. Green owns and operates many eligible net metering systems that have entered net metering finance arrangements with more than one eligible net metering customer, including WED GW SOLAR, LLC, WED PORTSMOUTH ONE, LLC, GD HOPKINTON MAIN I, LLC, WED SHUN I, LLC, WED GREEN HILL, LLC. These projects were approved by National Grid and are already interconnected to the distribution system and generating power.

6. The Petitioner does not have any projects currently interconnected to the distribution system and generating power.

7. Green will advocate different and supplemental legal positions in support of the declaratory judgment sought in the petition, including principally that there is no ambiguity in the statutory authorization for more than one eligible customer to enter net metering finance arrangements with a single net metering system and that no other construction of the statute comports with the purposes of Rhode Island's net metering law, as set out in 39-26.4-1. *See* Green Development, LLC's Memorandum (attached).

8. In these ways, Green has currently unrepresented interests in this proceeding.
Please direct service of any correspondence or pleadings in connection with this proceeding to:

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and

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Green respectfully asks that the PUC grant its Motion to Intervene.

GREEN DEVELOPMENT, LLC, WED GW
SOLAR, LLC, WED PORTSMOUTH ONE,
LLC, GD HOPKINTON MAIN I, LLC, WED
SHUN I, LLC, WED GREEN HILL, LLC

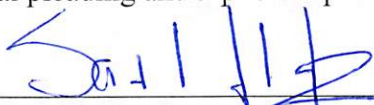
By their attorneys,



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CERTIFICATE OF SERVICE

I hereby certify that on March 3, 2021, I sent a true copy of the document by electronic mail to the PUC and the service list and mailed the original pleading and 9 photocopies to the PUC.



Seth H. Handy